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**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
Washington, D.C. 20549

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**FORM SD**

**Specialized Disclosure Report**

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**Cavco Industries, Inc.**

(Exact name of registrant as specified in its charter)

**Delaware**  
(State or other jurisdiction  
of incorporation)

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**000-08822**  
(Commission  
File Number)

**56-2405642**  
(IRS Employer  
Identification No.)

**3636 North Central Avenue, Suite 1200  
Phoenix, Arizona 85012**

(Address of principal executive offices, including zip code)

**Mickey R. Dragash**  
(602) 256-6263

(Name and telephone number, including area code, of the person to contact in connection with this report.)

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Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020.
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## **Section 1 – Conflict Minerals Disclosure**

### **Item 1.01. Conflict Minerals Disclosure and Report**

The Conflict Minerals Report for the calendar year ended December 31, 2020 filed herewith as Exhibit 1.01, is publicly available at: <http://investor.cavco.com>.

### **Item 1.02. Exhibit**

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

## **Section 2 – Exhibits**

### **Item 2.01. Exhibits**

The following exhibit is filed as part of this report:

#### **Exhibit**

#### **Number   Description**

[1.01](#)      [Conflict Minerals Reports as required by Items 1.01 and 1.02 of this Form](#)

## SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

CAVCO INDUSTRIES, INC.

By: /s/ Mickey R. Dragash  
Mickey R. Dragash  
General Counsel, Chief Compliance Officer  
and Corporate Secretary

Date: May 27, 2021

**Cavco Industries, Inc.**  
**Conflict Minerals Report**  
For the Calendar Year Ending December 31, 2020

We have prepared and furnished this Conflict Minerals Report, for the calendar year ending December 31, 2020, pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended ("Rule 13p-1"). Please refer to Rule 13p-1, Form SD and the 1934 Act Release No. 34-67716 for definitions of the terms used in this Report, unless otherwise defined herein.

***Company Overview***

Cavco Industries, Inc. ("Cavco," "us," "we," or the "Company") designs and produces factory-built homes, park model RVs, vacation cabins and systems-built commercial structures. A majority of our products are built under the United States Department of Housing and Urban Development ("HUD") standards for factory-built homes.

Cavco does not purchase raw ore or unrefined Conflict Minerals, and makes no purchases from the Democratic Republic of the Congo or its adjoining countries (the "Covered Countries"). Cavco is several levels removed from the mining and processing of Conflict Minerals, but we nevertheless expect that our suppliers will purchase products and materials that are conflict free. As such, the Company is committed to ensuring compliance with the Dodd-Frank Act and related SEC regulations relating to Conflict Minerals.

***Conflict Minerals Compliance Process***

In furtherance of our Conflict Minerals initiatives, we designed and performed the following due diligence measures for 2020, in accordance with the guidance issued by the Organization for Economic Cooperation and Development's ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance"), an internationally recognized framework.

- **OECD Guidance Step 1: Establish Strong Company Management Systems**

Cavco has a Conflict Minerals Policy aimed at reducing the risk that our products contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries. This policy includes the processes by which the Company facilitates compliance with the Dodd-Frank Act and related SEC regulations relating to Conflict Minerals.

The Company has a Conflict Minerals Task Force ("Task Force") to assist in ensuring compliance with the Conflict Minerals Policy. This Task Force includes our Chief Accounting Officer, General Counsel, Director of Purchasing, Director of Compliance, Director of Internal Audit, Director of Financial Reporting and members of the Financial Reporting team. Subject matter experts are consulted on an as needed basis.

- OECD Guidance Step 2: Identify and Assess Risks in the Supply Chain

As noted above, Cavco does not purchase raw ore or unrefined Conflict Minerals and makes no purchases from the Covered Countries. Therefore, we must rely upon our independent suppliers to provide information with respect to the origin of Conflict Minerals contained in the products they supply. Our reasonable country of origin inquiry ("RCOI"), and other due diligence measures, can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the necessary Conflict Minerals. Our due diligence processes are based on the necessity of seeking data from our independent suppliers of in scope products and on those suppliers, in turn, seeking similar information within their supply chains to identify the original sources of the necessary Conflict Minerals.

Members of the Task Force, assisted by individuals in our engineering department, evaluated the products used in our manufacturing process and identified those components considered necessary to the functionality or production of our products. The Company determined that components considered necessary to the functionality or production of our products are those that are required under the HUD standards. Any such components we identified as potentially containing Conflict Minerals were designated as "in scope products" for the purposes of our RCOI and due diligence. The RCOI was designed to determine whether the Conflict Minerals contained in our in scope products originated in a Covered Country or came from recycled or scrap materials.

The Company requested and obtained information from its suppliers of in scope products regarding the use and origin of Conflict Minerals in applicable products supplied to the Company. We asked our suppliers to utilize the Conflict Minerals Reporting Template ("CMRT") developed by the Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative to report their sourcing procedures.

We reviewed the responses received from the identified suppliers for completeness, errors and inconsistencies. Incomplete, inconsistent or missing responses elicited further inquiry from the Company. As of the date of this report, we have received responses from 80% of our independent suppliers of in scope products, and we are continuing to follow up on missing responses.

- OECD Guidance Step 3: Design and Implement a Strategy to Respond to Identified Risks

Upon evaluation of the responses received, a minority of our suppliers indicated that the products they supply to us are free of Conflict Minerals, and thus an RCOI was not required. The remaining respondents are still in the process of identifying the countries and smelters that supply conflict minerals for the in scope products sold to us.

Contained within these CMRTs were partial listings of smelters and refiners that supply Conflict Minerals to our vendors. Some of these refiners have been identified as operating in a Covered Country; however, those that do operate in a Covered Country have been certified as compliant and conflict free. Nevertheless, the data provided is at the supplier, or in some cases the parent company, level and can not be directly tied to a component part that the Company purchases from the supplier. Consequently, we are unable to determine which of the Conflict Minerals reported by the respondent are contained in components or parts supplied to us, or to validate that any of these smelters or refiners are directly in our supply chain. As a result, we have elected not to present smelter and refiner names in this report.

- OECD Guidance Step 4: Carry out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

Because the Company is not the direct purchaser of Conflict Minerals, the Company does not conduct or commission independent third-party audits of the smelters and refiners from which its vendors and service providers source Conflict Minerals. In creating and implementing our Conflict Minerals compliance program, the Company relies upon the results obtained from our independent suppliers.

- OECD Guidance Step 5: Report on Supply Chain Due Diligence

With the preparation and submission of this Conflict Minerals Report, the Company has provided a public report of its due diligence measures with regard to the sourcing of Conflict Minerals. A copy of this report is also made available on the Company's investor relations website at <http://investor.cavco.com>. Pursuant to Rule 13p-1, the Company will prepare and submit a Conflict Minerals Report each year, as required.

### ***Due Diligence Results***

Based on our suppliers' RCOI responses, including the incomplete listing of smelters and refiners and our limited access to supply chain information, we do not have sufficient information to conclusively determine the countries of origin of the Conflict Minerals, or the status of the smelters or refiners used for our in scope products.

### ***Risk Mitigation/Future Due Diligence Measures***

The Company intends to continue to engage with identified independent suppliers to obtain accurate and complete information about the supply chain and ask that they continue to improve their due diligence efforts to identify smelters and refiners processing Conflict Minerals contained in our in scope products.